



SAN DIEGO REGIONAL
WATER QUALITY
CONTROL BOARD
DEPARTMENT OF THE NAVY
COMMANDER NAVY REGION SOUTHWEST
937 NO. HARBOR DR.
SAN DIEGO, CALIFORNIA 92132-0058
2003 MAR 25 A 10:55

JMK 3/25
Mike M 3/24
plz postpone this item to April
IN REPLY REFER TO:
5090
Ser N45JWB/0097
March 19, 2003
JD 3-28-03
PR 3-28-03

Mr. John Robertus
Executive Officer
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA 92123

Item No. 10
Supporting Document No. 7

Dear Mr. Robertus:

Our office requests a 30-day extension of the current comment period for Tentative Order No. R9-2003-0008 (draft permit). The additional time is requested for the following reasons:

1. The period between the issuance of the draft permit and the comment due date does not allow for the requisite thirty-day comment period. The draft permit was received by our office on March 12, 2003 and was posted on the San Diego Regional Water Quality Control Board website March 13, 2003. The comment period ends March 26, 2003, which is a public comment period of at most 15 days. The applicable NPDES regulations at 40 CFR Section 124.10(b)(1) provides, "Public notice of the preparation of a draft permit (including a notice to deny a permit application) required under paragraph (a) of this section shall allow at least 30 days for public comment." We do not believe this 30-day comment period has been satisfied.

2. The Navy is preparing for a possible war with Iraq and the restrictions associated with a war will significantly limit the ability to review and comment on the draft permit. If war comes, key Navy staff members may have limited access to their offices and meeting venues because of wartime security restrictions. The ability to review and comment on the draft permit and prepare for the public hearing scheduled for April 9, 2003 will be significantly curtailed by these restrictions. Allowing additional time to comment will ensure all necessary Commander Navy Region Southwest (CNRSW) personnel have reviewed and are briefed on the draft permit so that useful comments are provided to the Regional Board.

3. The CNRSW Environmental Assistant Chief of Staff and the Commanding Officer, Naval Base Coronado will both be out of town on military business during the latter part of the current comment period. Because of these prior commitments, they will be unable to review the Navy staff comments on the draft permit prior to the March 26 due date. Allowing additional comment time

5090
Ser N45JWB/0097
March 19, 2003

will ensure the Officer in charge of environmental affairs for CNRSW has reviewed all Navy comments prior to their submittal, and the Commanding Officer of the installation to which the draft permit pertains can be briefed.

If there are any questions regarding this request, please feel free to contact me at (619) 524-6417.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert A. Chichester", with a long horizontal flourish extending to the right.

ROBERT A. CHICHESTER
Director, Water Program
By direction of the Commander



DEPARTMENT OF THE NAVY
COMMANDER NAVY REGION SOUTHWEST
937 NO. HARBOR DR.
SAN DIEGO, CALIFORNIA 92132-0058

IN REPLY REFER TO:

5090

Ser N45JWB/0111

March 26, 2003

Mr. John Robertus
Executive Officer
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA 92123

ND 2-27-03

Item No. 10

Supporting Document No. 9

Dear Mr. Robertus:

Comments for tentative Order No. R9-2003-0008, Naval Base Coronado (NBC) NPDES Permit, are submitted in Enclosure (1). We appreciate the opportunity to review and comment on the draft permit.

It is our understanding that an extension to the comment period has been granted and the NBC Permit hearing will be held on May 14, 2003. If additional comments are submitted by our office they will be submitted prior to the comment due date for the May hearing.

If there are any questions regarding this submittal, please feel free to contact me at (619) 524-6417.

Sincerely,

ROBERT A. CHICHESTER
Director, Water Program
By direction of the Commander

Enclosure: 1. CNRSW comments on tentative Order No. R9-2003-0008.

2003 MAR 26 A 3:44
SAN DIEGO REGIONAL
WATER QUALITY
CONTROL BOARD

CNRSW Comments
Tentative Order No. R9-2003-0008
NBPL NPDES Permit No. CA0109185

Toxicity Issues:

1 **Tentative Order No. R9-2003-0008, Page 8, Section B.4.a:**

The Navy reiterates its concerns with the disparity in, and inconsistent application of toxicity standards among NPDES permittees as set out in its prior comments to the Naval Base Point Loma NPDES permit CA0109363. The Navy believes one standard should apply to all permittees because it is the toxicity of runoff that is of concern, and not the source of the runoff or runoff constituents that cause toxicity. The RWQCB has determined that a 70% standard is sufficient to protect the bay as evidenced by the standard's application to the boatyard. Current Navy efforts may identify a more appropriate toxicity standard, but until then the 70% and not the 90% standard should apply in this permit.

High Risk Area Diversion Issues:

- 2** **Tentative Order No. R9-2003-0008, Page 3, Paragraph 11:** This paragraph requires the first ¼ inch of storm water runoff from high risk areas to be terminated. The City of San Diego Metropolitan Waste Water Department has informed us that after September 30, 2004 only the first ¼ inch of each rain event will be allowed to be discharged into the sanitary sewer. This ¼ inch must be held until 24 hours after the rain event has ended. Infrastructure will need to be built to meet this capture and hold requirement. The Navy uses a projected 3 year budget system and as such requests the high risk ¼ inch termination be changed from 2 years to 3 years after the permit adoption. This will allow sufficient time to budget funds for the project.

Other Tentative Order R9-2003-0008 Comments:

- 3** **TENTATIVE NPDES PERMIT**
Page 2, Item 3: NAB is listed as having areas used for ship repair and maintenance activities. No ships are ported at NAB. Boats that can be lifted from the water are used at the installation. Accordingly, the 70% toxicity standard applicable to the boat yards should be applied because the NAB facility is more characteristic of a boatyard than shipyard.
- 4** **Attachment D, Page 3, Item 4.f.:** There is a type-o and a NAVSTA reference was left in the current text.

MONITORING AND REPORTING PROGRAM

- 5** **Page M-5, 3. Engine Cooling/Sprinkler Water:** Request that the semi-annual discharge log requirement be changed to an annual discharge log requirement. This will assist the

Navy is better utilizing it's manpower resources and still should meet the SD RWQCB staff data requirement.

6 Page M-8 and M-9, items 4 and 5. Evaluation Monitoring of the Aqua Shield, AquaSwirl storm water treatment systems at NAS North Island, Joliet Pier: CNRSW believes requiring 60 samples with 13 analytes per sample and performance graphs and tables for the storm water treatment units is beyond the scope of an NPDES Permit. California Water Code 13360. (a) states,

“No waste discharge requirement or other order of a regional board or the state board or decree of a court issued under this division shall specify the design, location, type of construction, or particular manner in which compliance may be had with that requirement, order, or decree, and the person so ordered shall be permitted to comply with the order in any lawful manner. However, the restrictions of this section shall not apply to waste discharge requirement or decree with respect to any of the following:...”

This NPDES Permit requirement should be limited to the discharge of these treatment units meeting discharge requirements and not their performance efficiency.

FACT SHEET

7 Page 2, Third full paragraph, last sentence: The last sentence of this paragraph states that boats can be placed upon piers for repairs. Boats are not place on piers for repairs at the Naval Base Coronado Complex. Request the sentence be re-phrased to incorporate this statement.

8 Page 4, Fourth full paragraph: Recommend changing the fourth sentence to, “Berth side ship repair and maintenance (that is maintenance while the vessel is docked at the pier) may include *topside* abrasive blasting, hydro-blasting, metal grinding, painting, *on board (inside ship)* tank cleaning, removal of bilge and ballast water, sheet metal work, electrical work, mechanical repair, engine repair, hull repair and sewage disposal, *ship free board paint and hull anti-fouling paint maintenance. removal of anti-fouling paint.*”. The reason for this recommended change is during berth side ship repair and maintenance, only topside, hull and free board areas of the ship are potential point sources (not conducted internal to the ship). All of the other operations described above are conducted internal to the ship hull.

9 Page 5, Third full paragraph: There is a type-o a replace IWPT with IWTP.

10 Page 5, Fifth full paragraph: Request you add the word “some” to the sentence, “There are some high concentrations of copper and zinc in the industrial storm water discharges from the NAS North Island.” The sentence currently infers that all industrial storm water discharges from NAS North Island are high.

11 Page 6, Third full paragraph: Request you add the word “some” to the sentence, “There are some high concentrations of copper and zinc in the industrial storm water discharges

from the NAB.” The sentence currently infers that all industrial storm water discharges from NAB are high.

12 Page 6, Fourth full paragraph: This section states that NAB has steam condensate, engine cooling/sprinkler system, and pier boom cleaning discharges. Pages 11, 17, and 25 correctly state that NAB does not have these discharges. Please change these items on Page 6 to match the discussion on pages 11, 17, and 25.

13 Page 7, First paragraph: Camp Surf is South / Southwest of NRRF. The current text has it North of NRRF.

14 Page 12: Table 1. lists Steam Condensate 1-2 Tank analytical results. CNRSW re-sampled the condensate tank on March 14, 2003 with Copper results of 0.09 mg/L and Zinc results of 0.02 mg/L. This lab data was e-mailed to SD RWQCB Staff on March 21, 2003. Additionally, this steam condensate tank collects condensate from the condensate return lines of the steam system. If the captured condensate meets steam plant limits it is re-introduced into the steam plant. If it is outside of steam plant limits it is discharged to the sanitary sewer system and not discharged as a point source. The original analysis was submitted as an additional reference source of steam condensate due to the lack of actual steam condensate discharges producing adequate volume to sample.

Please also note that additional latitude and longitude data was submitted to SD RWQCB Staff via e-mail on March 18, 2003 for two steam condensate discharge locations. The original submittal for these two locations only listed degrees and minutes for the location due to GPS interference from a nearby ship at the time of positioning. After the ship got underway, this location was rechecked and the degrees, minutes, and seconds for the two locations was obtained and forwarded.

15 Page 40: Request a copy of the Threat To Water Quality rating worksheet that was used for developing the NBC rating. Also, believe there is a type-o listing Naval Base San Diego with a point score rating of 515 instead of Naval Base Coronado Complex.



DEPARTMENT OF THE NAVY
COMMANDER NAVY REGION SOUTHWEST
937 NO. HARBOR DR.
SAN DIEGO, CALIFORNIA 92132-0058

IN REPLY REFER TO:
5090

Ser N45JWB/0143
April 24, 2003

JP 4-25-03
PJ 4/28/03

Mr. John Robertus
Executive Officer
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA 92123

Dear Mr. Robertus:

Comments for tentative Order No. R9-2003-0008, Naval Base Coronado (NBC) NPDES Permit, are submitted in Enclosure (1). We appreciate the opportunity to review and comment on the draft permit.

If there are any questions regarding this request, please feel free to contact me at (619) 524-6417.

Sincerely,

ROBERT A. CHICHESTER
Director, Water Program
By direction of the Commander

Enclosure: 1. CNRSW comments on tentative Order No. R9-2003-0008.

2003 APR 25 A 9:24
SAN DIEGO REGIONAL
WATER QUALITY
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CNRSW Comments #2
Tentative Order No. R9-2003-0008
NBPL NPDES Permit No. CA0109185

Pier Boom Cleaning:

Tentative Order No. R9-2003-0008, Page 1:

The Navy no longer uses high-pressure wash water to remove marine growth from pier booms at Naval Base Coronado Complex. Portable booms are brought on shore, allowed to dry, the marine growth is dry scrapped from the booms, and disposed of as solid waste. Permanent booms are scraped in place with the removed marine growth left in the bay as it falls. Naval Amphibious Base San Diego also uses the same boom cleaning method.